

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

December 30, 1994

Gus Pomeroy, Treasurer
Idaho Republican Party Federal
Campaign Account
P.O. Box 2267
Boise, ID 83701

Identification Number: C00170175

Reference: October Quarterly Report (7/30/94-9/30/94)

Dear Mr. Pomeroy:

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This letter is to inform you that as of December 28, 1994, the Commission has not received your response to our request for additional information, dated December 7, 1994. This notice request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with provisions of the Pederal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Erica Holder on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

\_John D. Gi√bson

Assistant Staff Director Reports Analysis Division

Enclosure



## FEDERAL ELECTION COMMISSION

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RQ-2

DEC 7 1994

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Dear Mr. Pomeroy:

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This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule 84 of your report to clarify the following descriptions: reimbursement, convention and convention refund. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR \$104.3(b)(3).

-Your calculations for Administrative/Voter Drive EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

-Please provide the totals for Lines 11(b), 19 and 21(c), Column B, of the Detailed Summary Page.

-Please provide the totals for Line 28(d), Columns A and B of the Detailed Summary Page.

## IDAHO REPUBLICAN PARTY FEDERAL CAMPAIGN ACCOUNT Page 2

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. \$441a(f) and 11 CFR \$110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to it CFR \$110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CPR \$103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Line 21(a) of the Detailed Summary Page discloses joint federal/non-federal operating expenditures during the reporting period. Committees must itemize each allocated disbursement made from its federal account or separate allocation account regardless of the amount. Please amend your report(s) by itemizing the expenditures on Schedule 84. 11 CFR \$104.10

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of \$130,146.19 in Operating

## IDABO REPUBLICAN PARTY FEDERAL CAMPAIGN ACCOUNT Page 3

Expenditures (nonfederal share). The sum of the entries itemized on Schedule H4, however, indicates the total to be different. Please amend your report to clarify the discrepancy.

-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the date, amount, and purpose of such payments as required by 11 CFR \$104.9(b).

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to nonfederal candidates (Gordon Crow) should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Schedule B4 discloses a disbursement(s) which is categorized as direct candidate support; however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the payment for direct candidate support in which the committee collects both federal and non-federal funds. The costs are allocated according to the time and space method or funds received ratio and reported on Schedule H2. 11 CFR \$\$106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the direct candidate support activity.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the rederal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Erica Holder Reports Analyst

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Reports Analysis Division

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Line: 11e

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| HO ÁE | COMMITTEE<br>PUBLICAN PARTY                                     |                            |                  |                |
|       | Crapo For Congress<br>PO Box 1013<br>Boise, ID 83701            | EMPLOYER<br>Info Requested | DATE             | AMOUNT<br>500  |
|       |   | OCCUPATION                 |                  |                |
|       | eipt for:   | Aggregate TTD: \$          | 6,128.85         |                |
| B.    | Crapo For Congress<br>PO Box 1013<br>Boise, ID 83701            | EMPLOYER<br>Info Requested | DATE<br>09/21/94 | AMOUN<br>5,628 |
|       |   | OCCUPATION                 |                  |                |
| Rec   | eipt for:   | Aggregate YTD: 5           | 6,128.85         |                |
|       | Mr. and Mrs. Wayne Crow<br>504 16th Ave. S.<br>Mampa, ID \$3651 | EMPLOYER<br>self           | DATE<br>09/19/94 | AMOUN<br>50    |
|       |   | OCCUPATION<br>accountant   |                  |                |
| Rec   | eipt for:   | Aggregate YTD: \$          | 300.00           |                |
|       | Mr. Laddy Dale<br>Box 2528<br>Hailey, ID 93333                  | EMPLOYER<br>Info Requested | DATE<br>07/06/94 | AMOUN<br>40    |
|       |   | OCCUPATION                 |                  |                |
| Rec   | eipt for:   | Aggregate YTD: \$          | 348.00           |                |
|       | Mr. and Mrs. Rdward Dau<br>1801 Prospect<br>Lewiston, ID 63501  | EMPLOYER                   | DATE<br>07/14/94 | AMOUN<br>50    |
| ħ     | eipt for:   | OCCUPATION retired         |                  |                |
| REC   |   | Aggregate YTD: \$          |                  |                |
|       | Mr. Craig Dudley<br>Rt. 1, Box 37<br>Uniontown, WA 99179        | EMPLOYER<br>Info Requested | 0ATE<br>07/13/94 | AMOUN<br>220   |
|       |   | OCCUPATION                 |                  |                |
| Rec   | eipt for:   | Aggregate TTD: \$          | 320.00           |                |
|       | Mr. Craig Dudley<br>Rt. 1, Box 17<br>Uniontown, WA 99179        | EMPLOYER<br>Info Requested | DATE<br>09/19/94 | AMOUN<br>100   |
|       |   | OCCUPATION                 |                  |                |
| Rec   | eipt for:   | Aggregate TTD: \$          | 320.00           |                |
|       | of Receipts This Page (option                                   | <del></del>                |                  | 6,586          |